

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CAROL KULIG

on behalf of herself and all others similarly situated,

Plaintiff,

Civil Action No. 13-cv-4715

NOTICE OF MOTION

-v-

MIDLAND FUNDING, LLC,
MIDLAND CREDIT MANAGEMENT, INC.,
ENCORE CAPITAL GROUP, INC.
formerly MCM CAPITAL GROUP, INC.,
AMANDA PEREZ

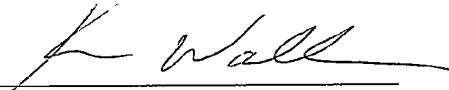
Defendants.

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PLEASE TAKE NOTICE that upon the annexed Declaration of Pat Minford executed September 3, 2013 and the exhibits annexed thereto, the annexed Declaration of Kevin P. Wallace executed September 4, 2013 and the exhibits annexed thereto, the accompanying memorandum of law dated September 4, 2013, and all of the pleadings and prior proceedings herein, the undersigned will move before the Honorable P. Kevin Castel, U.S.D.J. in Courtroom 12C, United States Courthouse, 500 Pearl Street, New York, New York 10007, for an order (i) pursuant to 9 U.S.C. § 4, compelling arbitration of the claims asserted in Plaintiff's Complaint; (ii) pursuant to 9 U.S.C. § 3, staying the instant action pending the completion of arbitration; and (iii) for such other and further relief as the Court deems proper.

Dated: New York, New York
September 4, 2013

TROUTMAN SANDERS LLP

By: 

Charles P. Greenman, Esq.

Kevin P. Wallace, Esq.

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Attorneys for Defendants